

EXHIBIT 1

MCCARTHY LAW PLC

LEARNED CONVERSATION. WITH COURTESY.

Kevin Fallon McCarthy, 011017
Ashley Tuchman, 027263
4250 North Drinkwater Blvd, Suite 320
Scottsdale, AZ 85251
602-456-8900
ashley.tuchman@mccarthylawyer.com
Attorneys for Plaintiff

**MANISTEE JUSTICE COURT
MARICOPA COUNTY, STATE OF ARIZONA
14264 WEST TIERRA BUENA LANE, SURPRISE, ARIZONA 85374**

GEORGE KRZYSTOFCZYK AND DOLORES
KRZYSTOFCZYK

Case No.: CC15-178066-re

Plaintiffs,

SUMMONS

v.

DEER VALLY CREDIT UNION, AN
ARIZONA CORPORATION, EQUIFAX INC.
and EXPERIAN INFORMATION
SOLUTIONS, INC.

Defendants.

STATE OF ARIZONA TO:

DEER VALLEY CREDIT UNION
S/A: AMY D. HOWLAND
702 EAST OSBORN ROAD, #200
PHOENIX, ARIZONA 85014

EQUIFAX, INC.
S/A: PRENTICE-HALL CORP SYSTEM
2338 WEST ROYAL PALM ROAD
PHOENIX, ARIZONA 85021

EXPERIAN INFORMATION SOLUTIONS, INC.
S/A: CT CORPORATION SYSTEM
3800 NORTH CENTRAL AVENUE SUITE 460
PHOENIX, ARIZONA 85012.

THE STATE OF ARIZONA TO THE ABOVE-NAMED DEFENDANT(S):

1. YOU ARE SUMMONED to respond to this complaint by filing a written ANSWER with this

1 Court and by paying the required fee. If you cannot afford to pay the required fee, you may
2 request that the Court either waive or defer the fee.

3 2. If you were served with this summons in the State of Arizona, the Court must receive your
4 answer within twenty (20) calendar days from the date you were served. If you were served
5 outside the State of Arizona, the Court must receive your answer within thirty (30) calendar days
6 from the date you were served. If the last day is a Saturday, Sunday, or legal holiday, you will
7 have until the next working day to file your answer. When calculating time, do not count the day
8 you were served with the summons.

9 3. Your answer must be in writing.

10 (a) You may obtain an answer form from this Court.

11 (b) You may also obtain an answer form from the Form section of the Maricopa County
12 Justice Courts website at <http://justicecourts.maricopa.gov>.

13 4. Provide a copy of your answer to the Plaintiff(s) or to the Plaintiff's attorney in accordance
14 with JCRCP Rule 120.

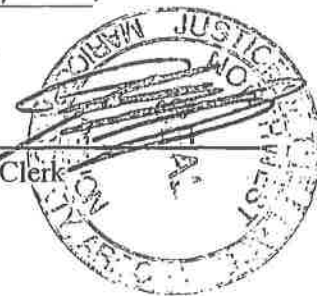
15 **5. IF YOU FAIL TO FILE A WRITTEN ANSWER WITH THIS COURT WITHIN THE**
16 **TIME INDICATED ABOVE, A DEFAULT JUDGMENT MAY BE ENTERED AGAINST**
17 **YOU.**

18 The name and address of Plaintiff's attorney is:

19 Kevin Fallon McCarthy, Esq.
20 Ashley Tucman, Esq.
21 McCARTHY LAW PLC
22 4250 North Drinkwater Boulevard, #320
Scottsdale, Arizona 85251

23 SIGNED AND SEALED this date: 9-21-15

24
25 By: 
26 Deputy Clerk
27



NOTICE TO THE DEFENDANT: A LAWSUIT HAS BEEN FILED AGAINST YOU IN JUSTICE COURTS

You have rights and responsibilities in this lawsuit. Read this notice carefully.

1. In a justice court lawsuit, individuals have a right to represent themselves, or they may hire an attorney to represent them. A family member or a friend may not represent someone in justice court unless the family member or friend is an attorney. A corporation has a right to be represented by an officer of the corporation, and a limited liability company ("LLC") may be represented by a managing member. A corporation or an LLC may also be represented by an attorney. If you represent yourself, you have the responsibility to properly complete your court papers and to file them when they are due. The clerks and staff at the court are not allowed to give you legal advice. If you would like legal advice, you may ask the court for the name and phone number of a local lawyer referral service, the local bar association, or a legal aid organization.

2. You have a responsibility to follow the Justice Court Rules of Civil Procedure ("JCRCP") that apply in your lawsuit. The rules are available in many public libraries, at the courthouse, and online at the Court Rules page of the Arizona Judicial Branch website, at <http://www.azcourts.gov/>, under the "AZ Supreme Court" tab.

3. A "plaintiff" is someone who files a lawsuit against a "defendant." You must file an answer or other response to the plaintiff's complaint in writing and within twenty (20) days from the date you were served with the summons and complaint (or thirty (30) days if you were served out-of-state.) If you do not file an answer within this time, the plaintiff may ask the court to enter a "default" and a "default judgment" against you. Your answer must state your defenses to the lawsuit. Answer forms are available at the courthouse, on the Maricopa County Justice Court website at <http://justicecourts.maricopa.gov/>, and on the Self-Service Center of the Arizona Judicial Branch website at <http://www.azcourts.gov/> under the "Public Services" tab. You may also prepare your answer on a plain sheet of paper, but your answer must include the court location, the case number and the names of the parties. You must provide to the plaintiff a copy of any document that you file with the court, including your answer.

4. You may bring a claim against the plaintiff if you have one. When you file your answer or written response with the court, you may also file your "counterclaim" against the plaintiff.

5. You must pay a filing fee to the court when you file your answer. If you cannot afford to pay a filing fee, you may apply to the court for a fee waiver or deferral, but you must still file your answer on time.

6. You may contact the plaintiff or the plaintiff's attorney and try to reach an agreement to settle the lawsuit. However, until an agreement is reached you must still file your answer and participate in the lawsuit. During the lawsuit, the court may require the parties to discuss settlement.

7. Within forty (40) days after your answer has been filed, you and the plaintiff are required to provide a disclosure statement to each other. The disclosure statement provides information about witnesses and exhibits that will be used in the lawsuit. A party may also learn more about the other side's case through discovery. Read the Justice Court Rules of Civil Procedure for more information about disclosure statements and discovery.

8. The court will notify you of all hearing dates and trial dates. You must appear at the time and place specified in each notice. If you fail to appear at a trial or a hearing, the court may enter a judgment against you. To assure that you receive these notices, you must keep the court informed, in writing, of your current address and telephone number until the lawsuit is over.

MCCARTHY LAW PLC

CAREER CONSULTATION, WINE CONSULT

Kevin Fallon McCarthy, 011017
Ashley Tuchman, 027263
4250 North Drinkwater Blvd, Suite 320
Scottsdale, AZ 85251
602-456-8900
ashley.tuchman@mccarthylawyer.com
Attorneys for Plaintiff

**MANISTEE JUSTICE COURT
MARICOPA COUNTY, STATE OF ARIZONA**
14264 WEST TIERRA BUENA LANE, SURPRISE, ARIZONA 85374

GEORGE KRZYSTOFCZYK AND
DOLORES KRZYSTOFCZYK

Plaintiffs,

v.

DEER VALLY CREDIT UNION, AN
ARIZONA CORPORATION, EQUIFAX
INC., and EXPERIAN INFORMATION
SOLUTIONS, INC.

Defendants.

Case No.: CC 2015-178066-RC

**COMPLAINT FOR VIOLATION OF
FAIR CREDIT REPORTING ACT (15
U.S.C. § 1681 et seq.)**

COMES NOW Plaintiffs, George Krzystofczyk and Dolores Krzystofczyk (Plaintiff), by and through counsel undersigned, and for their cause of action against the Defendants above-named allege as follows:

1. That Plaintiffs are and were at all times hereinafter mentioned residents of Maricopa County, Arizona.

2. That, on information and belief, Defendant, Deer Valley Credit Union ("Deer Valley CU"), is, and at all times relevant hereto was, a corporation registered with the Arizona Corporation Commission and authorized to do business in Arizona and has designated the following registered statutory agent: AMY D HOWLAND, 702 EAST OSBORN ROAD #200 PHOENIX, ARIZONA 85014.

3. That, on information and belief, Defendant, Deer Valley CU, is, and at all times relevant hereto was, regularly doing business in the State of Arizona.

4. That, on information and belief, Defendant, Equifax, Inc. ("Equifax"), is a credit reporting agency, as defined by FCRA § 1681a(f), licensed to do business in Arizona and has

Krzystofczyk v. Deer Valley et al.

1 designated the following registered statutory agent: PRENTICE-HALL CORP SYSTEM, 2338
2 WEST ROYAL PALM ROAD, PHOENIX, ARIZONA 85021.

3 5. That, on information and belief, Defendant, Equifax, is, and at all times relevant hereto
4 was, regularly doing business in the State of Arizona.

5 6. That, on information and belief, Defendant, Experian Information Solutions, Inc.
6 ("Experian"), is a credit reporting agency, as defined by FCRA § 1681a(f), licensed to do
7 business in Arizona and has designated the following registered statutory agent: CT
8 CORPORATION SYSTEM, 3800 NORTH CENTRAL AVENUE SUITE 460, PHOENIX,
9 ARIZONA 85012.

10 7. That, on information and belief, Defendant, Experian, is, and at all times relevant hereto
11 was, regularly doing business in the State of Arizona.

12 8. That the Court has jurisdiction over this action pursuant to 15 U.S.C. § 1681p, the Fair
13 Credit Reporting Act ("FCRA") and that personal jurisdiction exists over Defendant as it had the
14 necessary minimum contacts with the State of Arizona and this suit arises out of its specific
15 conduct with Plaintiff in Arizona. All the actions described in this suit occurred in the State of
16 Arizona.

17 9. That Deer Valley CU held a loan made to Plaintiff as of January 8, 2013. *See* Exhibit A,
18 Deer Valley Payment Demand.

19 10. That Deer Valley CU sold the Plaintiff's loan to Elan/US Bank as of April 9, 2014. *See*
20 Exhibit B, Deer Valley Settlement Letter.

21 11. That the former Deer Valley CU loan was settled by Portfolio Recovery Associates, and
22 agent of Elan/US Bank. *See* Exhibit B, Deer Valley Settlement Letter.

23 12. That the Plaintiff accepted this offer of settlement. *See* Exhibit C Settlement Check One
24 and *See* Exhibit D Settlement Check Two

25 13. That Portfolio Recovery Associates mailed a letter to Plaintiff stating the account had a
26 zero balance. *See* Exhibit E Zero Balance Letter.

27 14. Plaintiff George Krzystofczyk has sent written dispute regarding the accuracy of the
28 derogatory information reported by the Defendant Deer Valley CU to Defendant Equifax. *See*

Krzystofczyk v. Deer Valley et al.

1 Exhibit F Equifax Dispute Letter.

2 15. Plaintiff Dolores Krzystofczyk has sent written dispute regarding the accuracy of the
3 derogatory information reported by the Defendant Deer Valley CU to Defendant Experian. *See*
4 Exhibit G Experian Dispute Letter.

5 16. Defendant Equifax has willfully failed to correct the inaccurate reporting of the account
6 in violation of FCRA § 1681i and to the detriment of the consumer Plaintiff. *See* Exhibit H
7 Equifax Response.

8 17. Defendant Experian has willfully failed to correct the inaccurate reporting of the
9 account in violation of FCRA § 1681i and to the detriment of the consumer Plaintiff. *See* Exhibit
10 I Experian Response.

11 18. That the Defendant Deer Valley CU is willfully reporting derogatory and inaccurate
12 information about Plaintiff to one or more consumer reporting agencies ("CRAs") as defined by
13 15 U.S.C. § 1681a.

14 19. The Defendants Equifax and Experian are willfully reporting derogatory and inaccurate
15 information about Plaintiffs to third-parties.

16 20. Defendants Equifax and Experian willfully failed to maintain reasonable procedures to
17 assure maximum accuracy of the information contained in Plaintiff's credit report in violation of
18 FCRA § 1681e.

19 21. The foregoing acts and omissions of the Defendants constitute unacceptable violations
20 of the FCRA.

21 22. As a result of the foregoing, Plaintiffs have suffered damages in an amount to be shown
22 at trial, but not exceeding \$10,000.

23 WHEREFORE, Plaintiff seeks a reasonable and fair judgment against defendants for
24 willful noncompliance of the Fair Credit Reporting Act and seeks his statutory remedies as
25 defined by 15 U.S.C. § 1681n and demands:

26 1. Actual damages, pursuant to 15 U.S.C. § 1681n(1)(A), of not less than \$100 and
27 not more than \$1,000 per violation;

28 2. Punitive damages, pursuant 15 U.S.C. § 1681n(2), for Defendant's willful

Krzystofczyk v. Deer Valley et al.

3

COMPLAINT

1 violation;

2 3. The costs of instituting this action together with reasonable attorney's fees
3 incurred by Plaintiff pursuant to 15 U.S.C. § 1681n(3); and

4 4. Any further legal and equitable relief as the court may deem just and proper in the
5 circumstances.

6 Respectfully submitted this 17th day of September, 2015.

7
8 MCCARTHY LAW, PLC


9 By: 
10 Ashley Tuchman, Esq.
11 Attorney for Plaintiffs
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EXHIBIT A



Exceptional Service
Incredible Value

GEORGE E KRZYSTOFczyk
3920 W GARDEN DRIVE
PHOENIX, AZ 85029

08 JAN 2013
MEMBER 475891

RE: 475891199

Dear GEORGE E KRZYSTOFczyk:

Our records show you still have an outstanding balance due to Deer Valley Credit Union in the amount of \$7,724.12.

This account may be turned over to our collection attorney or collection agency unless you call us to make payment arrangements on this balance. If you make arrangements directly with us, we will not charge additional interest or late fees. Once we submit this to our attorney or agency, you will be responsible for additional fees and costs.

We would consider these options:

- 1) Cash settlement offer from you (written proposal required)
- 2) An agreed upon repayment arrangement (written proposal required)

We understand that there may have been unavoidable circumstances that created this situation. After 60 days following the date of this letter, we will submit this to our attorney or agency for further action.

Sincerely,

Account Services

(602) 375-7300

(800) 579-5051

accountservices@dvcu.org

16215 North 28th Avenue
Phoenix, Arizona 85053-3040

Federally Insured by NCUA

Phone (602) 375-7300

Fax (602) 375-7333

www.dvcu.org

EXHIBIT B

Delivery last updated on 04/09/2014 04:00 PM by Nathaniel L. Phillips

Secure message

AGREED as PROPOSED

Hello,

I am having problems responding to your email via the secure email. Is there an issue with it?

Account# [REDACTED] 4658 - Balance is \$7,724.12 and settlement offer is \$3475.85.

I was able to confirm that this is the Deer Valley Credit Union account which was sold as part of their Visa Portfolio to Elan/US Bank.

We would like to accept your offer to settle for \$3,475.85 payable as follows:

\$1275.85 x 1 on 4/30/14

\$2200.00 x 1 on 5/30/14.

Please confirm your agreement to this arrangement.

Joan DiBella

Settlement firm speedy reply link

PRAInquiringService@portfoliorecovery.com

Nathaniel Phillips
Customer Service-Legal Support Rep
Portfolio Recovery Associates

Attention Settlement Firms: Effective Immediately (March 1st, 2010) Portfolio Recovery Associates will no longer generate agreement letters for your arrangements.

This preceding email message contains information that is confidential, and protected by the attorney/client or other applicable privileges, and may constitute non-public information. It is intended to be conveyed only to the designated recipient(s). If you are not an intended recipient of this message, please notify (Nathaniel Phillips) by reply email or phone and immediately delete this email. Unauthorized use, dissemination, distribution, or reproduction of this message is strictly prohibited and may be unlawful.

Biscom Delivery Server

<https://prasecuremail.portfoliorecovery.com/bds/LoginSubmit.do>

Portfolio Recovery Associates, Inc.

Personal Settings | Sign out [jan.dobosz@prasecuremail.com](https://prasecuremail.portfoliorecovery.com/bds/LoginSubmit.do)

Home > Your Delivery

Your Delivery

Details of the delivery

<p>Subject: 82 - George Krzywicki - accepting offer</p> <p>To: Jan.dobosz@prasecuremail.com</p> <p>CC: Eugene B. Bryant</p> <p>Subject: 82 - George Krzywicki - accepting offer</p> <p>From: Michael L. Prater</p>
--

Delivery URL loaded on 04/09/2014 04:20 PM by Michael L. Prater

Secure message
ADDRESS: 82-00000000

Hi,

I am having problems regarding to your email via the secure email. Is there an issue with it?

Account # [REDACTED] - Balance is \$7,724.12 and Settlement offer is \$3475.85.

I was able to confirm that this is the Debt Valley Credit Union account which was sold as part of their New Portfolio to BNYMS Bank.

You would like to accept your offer to settle for \$3,475.85 payable in full by:

\$1275.85 on 4/15/14

\$2199.00 on 5/15/14

Please confirm your agreement to this arrangement.

*Settlement firm typically reply 10-15.

PLEASE REPLY TO: jan.dobosz@prasecuremail.com

Michael Prater
Customer Service-legal Support Rep
Portfolio Recovery Associates

*Attorney Settlement Firm: Effective immediately (March 31, 2015) Portfolio Recovery Associates will no longer provide settlement letters for your arrangements.

This proceeding email contains information that is confidential, and protected by the attorney-client or other applicable privileges, and may constitute nonpublic information. It is intended to be conveyed only to the designated recipient(s). If you are not an intended recipient of this message, please notify (Michael Prater) by email or phone and immediately delete this email. Unauthorized use, dissemination, distribution, or reproduction of this message is strictly prohibited and may be unlawful.

From: Joan Dobosz [mailto:joan.dobosz@prasecuremail.com]
Sent: Wednesday, April 09, 2014, 12:31 PM
To: PRA RequestingService
Subject: George Krzywicki - accepting offer

Hi,

I am having problems regarding to your email via the secure email. Is there an issue with it?

Account # [REDACTED] - Balance is \$7,724.12 and Settlement offer is \$3475.85.

I was able to confirm that this is the Debt Valley Credit Union account which was sold as part of their New Portfolio to BNYMS Bank.

You would like to accept your offer to settle for \$3,475.85 payable in full by:

\$1275.85 on 4/15/14

\$2199.00 on 5/15/14

Please confirm your agreement to this arrangement.

JOAN DOBOSZ
Senior Negotiator
McCarthy Law, PLLC
4250 North Drydenway Boulevard - Suite 200
Scottsdale, AZ 85251
(480) 436-8887 Direct Line
(480) 436-8800 ext. 866 Tel.
(480) 218-4447 Fax
joan.dobosz@prasecuremail.com
www.mccarthy-law.com

This communication is in furtherance of a claim which is disputed as to both validity and amount. As such, pursuant to Rule 43 of the Arizona Rules of Evidence and California Evidence Code §154, the contents of this communication is not admissible in the event settlement cannot be reached.

The information contained in this transmission may be attorney-client privileged and/or confidential. It is intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by reply e-mail. Our company accepts no liability for the content of this email, or for the consequences of any actions taken on the basis of the information provided, unless that information is subsequently confirmed in writing. Email transmission cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or out of sequence, or contain viruses. The sender therefore does not accept liability for any errors or omissions in the contents of this message, which arise as a result of email transmission.

Notification message
You have just received a secure message from Portfolio Recovery Associates.

File Name	Description	Date Created	Size
82-00000000			

Reply securely

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EXHIBIT C

Check Image Results

Page 1 of 1

Check Image Inquiry Results

Account #	Check #	Amount	Paid Date	Sequence #
[REDACTED]	[REDACTED]	\$1,275.85	04/29/2014	975153561

THIS CHECK IS VOID WITHOUT A GREEN & BLUE BORDER AND BACKGROUND PLY'S A KNIGHT & PONYPRINT INTERMARK ON THE BACK - HOLD AT ANGLE TO VIEW

Global Client Solutions, LLC Custodian
FBO George E. Krzystofczyk
4500 South 129th East Ave, Suite 176
Tulsa, Ok 74134

Comerica Bank
1717 Main St
Dallas, TX 75201
32-75/1110

201222283
042114_113404

P12720680
Date: 04/21/2014
Amount: \$\$\$ 1,275.85

Pay: ONE THOUSAND TWO HUNDRED SEVENTY-FIVE AND 85 / 100 DOLLARS

For: [REDACTED] 4668
George Krzystofczyk
4037660026314658
Deer Valley / Elan / US Bank

To The Order Of: Portfolio Recovery
P O Box 12914
Norfolk, VA US 23541

Authorized Signature
Questions: (877)503-4238
Valid After 60 Days

Seq: 202
Dep: 017683
Date: 04/28/14

For Deposit to Location:
Portfolio Recovery Associates LLC
Deposited by: Ashley R. [REDACTED]

1. THE FRONT OF THE CHECK MUST BE
2. THE BACK OF THE CHECK MUST BE
3. THE CHECK MUST BE DEPOSITED
4. THE CHECK MUST BE DEPOSITED
5. THE CHECK MUST BE DEPOSITED

EXHIBIT D

Check Image Results

Page 1 of 1

Check Image Inquiry Results

Account #	Check #	Amount	Paid Date	Sequence #
[REDACTED]	[REDACTED]	\$2,200.00	05/30/2014	973629758

THIS CHECK IS VOID WITHOUT A GREEN & BLUE BORDER AND BACKGROUND PLUS A KNIGHT'S FINGERPRINT WATERMARK ON THE BACK - FOLD AT ANGLE TO VIEW

Global Client Solutions, LLC Custodian
FBO George E. Krzytofcozyk
4600 South 129th East Ave, Suite 176
Tulsa, OK 74134

Comerica Bank
1717 Main St
Dallas, TX 75201
32-76/1110

201236051
062014_182516

P12720881
Date: 05/20/2014
Amount: \$ 2,200.00

Pay: TWO THOUSAND TWO HUNDRED AND XX / 100 DOLLARS

For: [REDACTED] 4658
George Krzytofcozyk
4037650026314658
Dear Valley / Elan / US Bank

To The Order Of: Portfolio Recovery
P O Box 12914
Norfolk, VA US 23541

Authorized Signature
Questions: (877) 503-6236
Valid After 60 Days

Seq: 87
Dep: 018415
Date: 05/29/14

FOR DEPOSIT ONLY - NOT CASH
Portfolio Recovery Systems, LLC
Portfolio Recovery Associates LLC
Items Processing
Deposited by: Giselle Agosto

1. THE CHECK IS VOID WITHOUT A GREEN & BLUE BORDER AND BACKGROUND PLUS A KNIGHT'S FINGERPRINT WATERMARK ON THE BACK - FOLD AT ANGLE TO VIEW
2. THE CHECK IS VOID WITHOUT A GREEN & BLUE BORDER AND BACKGROUND PLUS A KNIGHT'S FINGERPRINT WATERMARK ON THE BACK - FOLD AT ANGLE TO VIEW
3. THE CHECK IS VOID WITHOUT A GREEN & BLUE BORDER AND BACKGROUND PLUS A KNIGHT'S FINGERPRINT WATERMARK ON THE BACK - FOLD AT ANGLE TO VIEW
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EXHIBIT E

8/11/2014

Biscom Delivery Server



Portfolio Recovery Associates, Inc.

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[Home](#) > [Your Deliveries](#)

Your Delivery

[Delete this delivery](#)

Package name	Krzysztofczyk
To	Ali Mac
Cc	Regina R. Bryant
Subject	Krzysztofczyk
From	Catherine N. Harrison-Ecock

Delivery last updated on 08/11/2014 09:18 AM by Catherine N. Harrison-Ecock

Secure message

Per our terms, we do not send letters.
Zero balance letter was mailed to client on 6/22/2014.

Catherine N. Harrison-Ecock
Customer Service Legal Support

This communication is from a debt collector and is an attempt to collect a debt. Any information obtained will be used for that purpose. This communication is intended for the use of the individual to which it is addressed. This message contains information which may be privileged, confidential and exempt from disclosure under applicable law. If the reader of this communication is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited.

The preceding email message contains information that is confidential, and protected by the attorney/client or other applicable privileges, and may constitute non-public information. It is intended to be conveyed only to the designated recipient(s).

From: Ali Mac [mailto:ali.mac@mccarthylawyer.com]
Sent: Friday, August 08, 2014 5:35 PM
To: PRA InquiringService
Subject: Settled In Full Letter Request - Krzysztofczyk

We are requesting a letter stating our clients' account is settled in full. Please email the letter to me or fax it to 602 218 4447. He paid his last settlement payment back in May.

George Krzysztofczyk - [REDACTED]

Dolores Krzysztofczyk - [REDACTED]

Account # [REDACTED] 4658

Thank you for your assistance in this matter.

Kind regards,

Ali

Ali Mac
Office Manager
McCarthy Law PLC

McCarthy Law Office Locations
Los Angeles Area 310.564.0999
Phoenix Area 602.456.8900
San Diego Area 619.478.6200
San Francisco Area 415.684.9333
Sherman Oaks 818.812.4330

<http://www.McCarthyLawyer.com>

The information contained in this transmission may be attorney-client privileged and/or confidential. It is intended only for the use of the individual or entity named above. If the

8/11/2014

Biscom Delivery Server

reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by reply e-mail. Our company accepts no liability for the content of this email, or for the consequences of any actions taken on the basis of the information provided, unless that information is subsequently confirmed in writing. E-mail transmission cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. The sender therefore does not accept liability for any errors or omissions in the contents of this message, which arise as a result of e-mail transmission.

Notification message

You have just received a secure message from Portfolio Recovery Associates.

 File name	Description	Date Created	Size
No files found			

 Reply securelyPowered by **BISCOM**

EXHIBIT F

George E. Krzystofczyk
3626 West Mercer Lane
Phoenix, AZ 85029

March 13, 2015

Equifax Information Services, LLC
PO Box 740256
Atlanta, GA 30374

RE: George E. Krzystofczyk
3626 West Mercer Lane, Phoenix, AZ 85029
SS# [REDACTED]
DOB: [REDACTED]
Report Date: 01/28/2015
Confirmation # 4428629142

To Whom It May Concern:

Attached is a page from my credit report reporting debt owed to Deer Valley Credit Union in the amount of \$7,729.00 for Account #475891xxxx. This account was sold to Portfolio Recovery Associates. I have settled this debt with Portfolio Recovery Associates. No monies are currently owed to Deer Valley Credit Union.

I am requesting that this account be immediately corrected on my credit report to reflect a zero balance.

Regards,
George E. Krzystofczyk

Revolving accounts are charge accounts that have a credit limit and require a minimum payment each month, such as most credit cards.

Open Accounts

Account Number	Day	Perse	Days	Day	Perse	Days	Day	Perse	Days
DEER VALLEY CREDIT U	475891XXXX	12/05/2002	\$7.729	07/02/2012	\$299	PAYS 61-90	\$7.500	DAYS	

DEER VALLEY FEDERAL CREDIT

16215 N 28th Ave
Phoenix, AZ-850533040

Account Number:	475891XXXX	Current Status:	PAYS 61-90 DAYS
Account Owner:	Joint Account	High Credit:	\$ 10,060
Type of Account:	Revolving	Credit Limit:	\$ 7,500
Term Duration:		Terms Frequency:	Monthly (due every month)
Date Opened:	12/05/2002	Balance:	\$ 7,729
Date Reported:	07/02/2012	Amount Past Due:	\$ 299
Date of Last Payment:	04/2012	Actual Payment Amount:	
Scheduled Payment Amount:	\$ 154	Date of Last Activity:	N/A
Date Major Delinquency First Reported:		Months Reviewed:	99
Creditor Classification:		Activity Description:	N/A
Charge Off Amount:		Deferred Payment Start Date:	
Balloon Payment Amount:		Balloon Payment Date:	
Date Closed:		Type of Loan:	Credit Card
Date of First Delinquency:	05/2012		
Comments:	Fixed rate		

8.1-Month Payment History

[illegible]

EXHIBIT G

Dolores Krzystofczyk
3626 West Mercer Lane
Phoenix, AZ 85029

March 13, 2015

Experian
NCAC
PO Box 9702
Allen, TX 75013

RE: Dolores Krzystofczyk
3626 West Mercer Lane, Phoenix, AZ 85029
SS# [REDACTED]
DOB: [REDACTED]
Report Date: 02/08/2015
Report # 0925-9492-78

To Whom It May Concern:

Attached is a page from my credit report reporting debt owed to Deer Valley Credit Union in the amount of \$299.00 for Account #475891. I have settled this debt with Deer Valley Credit Union. No monies are currently owed to Deer Valley Credit Union.

I am requesting that this account be immediately corrected on my credit report to reflect a zero balance.

Regards,
Dolores Krzystofczyk

Experian - Report Summary

Page 7 of 29

FEB JAN DEC NOV OCT SEP AUG JUL JUN MAY APR MAR
OK OK OK OK OK OK OK OK OK OK OK OK

Account History:

Charge Off as of Aug 2010
180 days past due as of Jul 2010
150 days past due as of Jun 2010
120 days past due as of May 2010
90 days past due as of Apr 2010
60 days past due as of Mar 2010
30 days past due as of Feb 2010

DEER VALLEY CREDIT UNION

Address: 15458 N 28TH AVE
PHOENIX, AZ 85053
(602) 375-7300
Address Identification Number:
0163588235

Account Number:
475891

Status: Open: \$299 past due as of Jul 2012.

Status Details: By Mar 2019, this account is scheduled to go to a positive status.

Date Opened: 12/2002
Reported Since: 01/2003
Date of Status: 07/2012
Last Reported: 07/2012

Type: Credit card
Terms: NA
Monthly Payment: \$154
Responsibility: Joint with GEORGE E KRZYSTOFczyk

Credit Limit/Original Amount: NA
High Balance: \$10,080
Recent Balance: \$7,729 as of 07/2012
Recent Payment: \$0

Payment History:

2012												2011											
JUL	JUN	MAY	APR	MAR	FEB	JAN	DEC	NOV	OCT	SEP	AUG	JUL	JUN	MAY	APR	MAR	FEB						
60	30	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK						
2010												2009											
JAN	DEC	NOV	OCT	SEP	AUG	JUL	JUN	MAY	APR	MAR	FEB	JAN	DEC	NOV	OCT	SEP	AUG						
OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK						
2008												2007											
JUL	JUN	MAY	APR	MAR	FEB	JAN	DEC	NOV	OCT	SEP	AUG	JUL	JUN	MAY	APR	MAR	FEB						
OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK						
2006												2005											
JAN	DEC	NOV	OCT	SEP	AUG	JUL	JUN	MAY	APR	MAR	FEB	JAN	DEC	NOV	OCT	SEP	AUG						
OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK						
2004												2003											
JUL	JUN	MAY	APR	MAR	FEB	JAN	DEC	NOV	OCT	SEP	AUG	JUL	JUN	MAY	APR	MAR	FEB						
OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK						

Account History:

60 days past due as of Jul 2012
30 days past due as of Jun 2012

EXHIBIT H



EQUIFAX

CREDIT FILE : April 11, 2015

Confirmation # 5087016281

Dear George E Krzystofczyk:

Below are the results of your reinvestigation request and, as applicable, any revisions to your credit file. If you have additional questions regarding the reinvestigated items, please contact the source of that information directly. You may also contact Equifax regarding the specific information contained within this letter or report within the next 60 days by visiting us at www.investigate.equifax.com or by calling a Customer Representative at (888) 425-7961 from 9:00am to 5:00pm Monday-Friday in your time zone.

For an added convenience, use one of the below options to start an investigation or check the status of your dispute.

Please note, when you provide documents, including a letter, to Equifax as part of your dispute, the documents may be submitted to one or more companies whose information are the subject of your dispute.

Visit us at www.equifax.com/CreditReportAssistance or Call us at 866-349-5186.

Thank you for giving Equifax the opportunity to serve you.

000002644 FOECA0412150001220000 01 000000
001916376-4089
George E Krzystofczyk
3626 W Mercer Ln
Phoenix, AZ 85029-4033

P. O. Box 105518
Atlanta, GA 30348

The Results Of Our Reinvestigation

Credit Account Information

(For your security, the last 4 digits of account number(s) have been replaced by *)
(This section includes open and closed accounts reported by credit grantors)

Account History	1 : 30-59 Days Past Due	5 : 150-179 Days Past Due	J : Voluntary Surrender
Status Code	2 : 60-89 Days Past Due	6 : 180 or More Days Past Due	K : Repossession
Descriptions	3 : 90-119 Days Past Due	G : Collection Account	L : Charge Off
	4 : 120-149 Days Past Due	H : Foreclosure	

>>> We have researched the credit account. Account # - 4438* The results are: This account has been updated to report as a paid charge off. Additional information has been provided from the original source regarding this item. If you have additional questions about this item please contact: **Digital FCU, PO Box 9123, Marlborough MA 01752-9123**

>>> **We have researched the credit account. Account # - 475891* The results are:** This creditor has verified to OUR company that the balance is being reported correctly. Additional information has been provided from the original source regarding this item. If you have additional questions about this item please contact: **Deer Valley Federal Credit, 16215 N 28th Ave, Phoenix AZ 85053-3040**

Deer Valley Credit Union 16215 N 28th Ave Phoenix AZ 85053-3040 : (602) 862-5763													
Account Number	Date Opened		High Credit	Credit Limit		Terms Duration	Terms Frequency	Months' Rev'd	Activity Designator	Creditor Classification			
475891*	12/01/2002		\$10,060	\$7,500			Monthly	99					
Items As of	Balance	Amount	Date of	Actual	Scheduled	Date of 1st	Date of	Date of	Charge Off	Deferred Pay	Balloon Pay	Balloon	Date
Date Reported	Amount	Past Due	Last Paymnt	Paymnt Amount	Paymnt Amount	Delinquency	Last Activity	Del 1st Rptd	Amount	Start Date	Amount	Pay Date	Closed
04/11/2015	\$7,729	\$299	04/2012	\$0	\$154	05/2012			\$0		\$0		
Status - Charge Off; Type of Account - Revolving; Type of Loan - Credit Card; Whose Account - Joint Account; ADDITIONAL INFORMATION - Charged Off Account; Credit Card: Fixed Rate;													
Account History	06/2012												
with Status Codes	1												

Notice to Consumers

You may request a description of the procedure used to determine the accuracy and completeness of the information, including the business name and address of the furnisher of information contacted, and if reasonably available, the telephone number.

If the reinvestigation does not resolve your dispute, you have the right to add a statement to your credit file disputing the accuracy or completeness of the information; the statement should be brief and may be limited to not more than one hundred words (two hundred words for Maine residents) explaining the nature of your dispute.

If the reinvestigation results in the deletion of disputed information, or you submit a statement in accordance with the preceding paragraph, you have the right to request that we send your revised credit file to any company specifically designated by you that received your credit report in the past six months (twelve months for California, Colorado, Maryland, New Jersey and New York residents) for any purpose or in the past two years for employment purposes.

EXHIBIT I



Prepared for: DOLORES KRZYSTOFCZYK
 Date: April 03, 2015
 Report number: 0661-4667-42

Page 1 of 4

Dispute results

About our dispute process

This summary shows the revision(s) made to your credit file as a result of our processing of your dispute. If you still question an item, then you may want to contact the furnisher of the information directly or review the original information in the public record.

The federal Fair Credit Reporting Act provides that you may:

- request a description of how we processed your dispute, including the business name and address of any furnisher of information contacted in connection with such information and the telephone number if reasonably available;
- add a statement disputing the accuracy or completeness of the information; and
- request that we send these results to organizations who have requested your credit report in the past two years for employment purposes or six months for any other purpose.

If no information follows, our response appeared on the previous page.



Scan me with your smart phone
 for special offers from Experian.



0003051 01 MD 0432 **AUTO T8 0 7001 85029-403326 -C01-PO3054-I

DOLORES KRZYSTOFCZYK
 3626 WEST MERCER LANE
 PHOENIX AZ 85029-4033

PO Box 9701
 Allen, TX 75013

0186959740

How to read your results

Deleted - This item was removed from your credit report.

Remains - This item was not changed as a result of our processing of your dispute.

Updated - A change was made to this item; review this report to view the change. If ownership of the item was disputed, then it was verified as belonging to you.

Processed - This item was either updated or deleted; review this report to learn its outcome.

Results

We have completed the processing of your dispute(s). Here are the results:

Credit items	Outcome
DEER VALLEY CREDIT UNI 475891...	Updated

Visit experian.com/status to check the status of your pending disputes at any time.

Additional information

To view a full copy of your corrected credit report, visit experian.com/viewreport.

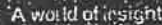
☐ To receive a copy by mail, check this box and within 30 days return this original page to P.O. Box 9701, Allen, TX 75013.

Copies will not be accepted.

What's your credit score?

Find out by ordering your VantageScore® from Experian for only \$7.95. To order, call 1 888 322 5583.

By law, we cannot disclose certain medical information (relating to physical, mental, or behavioral health or condition). Although we do not generally collect such information, it could appear in the name of a data furnisher (i.e. "Cancer Center") that reports your payment history to us. If so, those names display on your report, but on reports to others, they display only as MEDICAL PAYMENT DATA. Consumer statements included on your report at your request that contain medical information are disclosed to others.



Report number: 0661-4667-42

1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025, 2026, 2027, 2028, 2029, 2030, 2031, 2032, 2033, 2034, 2035, 2036, 2037, 2038, 2039, 2040, 2041, 2042, 2043, 2044, 2045, 2046, 2047, 2048, 2049, 2050, 2051, 2052, 2053, 2054, 2055, 2056, 2057, 2058, 2059, 2060, 2061, 2062, 2063, 2064, 2065, 2066, 2067, 2068, 2069, 2070, 2071, 2072, 2073, 2074, 2075, 2076, 2077, 2078, 2079, 2080, 2081, 2082, 2083, 2084, 2085, 2086, 2087, 2088, 2089, 2090, 2091, 2092, 2093, 2094, 2095, 2096, 2097, 2098, 2099, 2100, 2101, 2102, 2103, 2104, 2105, 2106, 2107, 2108, 2109, 2110, 2111, 2112, 2113, 2114, 2115, 2116, 2117, 2118, 2119, 2120, 2121, 2122, 2123, 2124, 2125, 2126, 2127, 2128, 2129, 2130, 2131, 2132, 2133, 2134, 2135, 2136, 2137, 2138, 2139, 2140, 2141, 2142, 2143, 2144, 2145, 2146, 2147, 2148, 2149, 2150, 2151, 2152, 2153, 2154, 2155, 2156, 2157, 2158, 2159, 2160, 2161, 2162, 2163, 2164, 2165, 2166, 2167, 2168, 2169, 2170, 2171, 2172, 2173, 2174, 2175, 2176, 2177, 2178, 2179, 2180, 2181, 2182, 2183, 2184, 2185, 2186, 2187, 2188, 2189, 2190, 2191, 2192, 2193, 2194, 2195, 2196, 2197, 2198, 2199, 2200, 2201, 2202, 2203, 2204, 2205, 2206, 2207, 2208, 2209, 2210, 2211, 2212, 2213, 2214, 2215, 2216, 2217, 2218, 2219, 2220, 2221, 2222, 2223, 2224, 2225, 2226, 2227, 2228, 2229, 2230, 2231, 2232, 2233, 2234, 2235, 2236, 2237, 2238, 2239, 2240, 2241, 2242, 2243, 2244, 2245, 2246, 2247, 2248, 2249, 2250, 2251, 2252, 2253, 2254, 2255, 2256, 2257, 2258, 2259, 2260, 2261, 2262, 2263, 2264, 2265, 2266, 2267, 2268, 2269, 2270, 2271, 2272, 2273, 2274, 2275, 2276, 2277, 2278, 2279, 2280, 2281, 2282, 2283, 2284, 2285, 2286, 2287, 2288, 2289, 2290, 2291, 2292, 2293, 2294, 2295, 2296, 2297, 2298, 2299, 2300, 2301, 2302, 2303, 2304, 2305, 2306, 2307, 2308, 2309, 2310, 2311, 2312, 2313, 2314, 2315, 2316, 2317, 2318, 2319, 2320, 2321, 2322, 2323, 2324, 2325, 2326, 2327, 2328, 2329, 2330, 2331, 2332, 2333, 2334, 2335, 2336, 2337, 2338, 2339, 2340, 2341, 2342, 2343, 2344, 2345, 2346, 2347, 2348, 2349, 2350, 2351, 2352, 2353, 2354, 2355, 2356, 2357, 2358, 2359, 2360, 2361, 2362, 2363, 2364, 2365, 2366, 2367, 2368, 2369, 2370, 2371, 2372, 2373, 2374, 2375, 2376, 2377, 2378, 2379, 2380, 2381, 2382, 2383, 2384, 2385, 2386, 2387, 2388, 2389, 2390, 2391, 2392, 2393, 2394, 2395, 2396, 2397, 2398, 2399, 2400, 2401, 2402, 2403, 2404, 2405, 2406, 2407, 2408, 2409, 2410, 2411, 2412, 2413, 2414, 2415, 2416, 2417, 2418, 2419, 2420, 2421, 2422, 2423, 2424, 2425, 2426, 2427, 2428, 2429, 2430, 2431, 2432, 2433, 2434, 2435, 2436, 2437, 2438, 2439, 2440, 2441, 2442, 2443, 2444, 2445, 2446, 2447, 2448, 2449, 2450, 2451, 2452, 2453, 2454, 2455, 2456, 2457, 2458, 2459, 2460, 2461, 2462, 2463, 2464, 2465, 2466, 2467, 2468, 2469, 2470, 2471, 2472, 2473, 2474, 2475, 2476, 2477, 2478, 2479, 2480, 2481, 2482, 2483, 2484, 2485, 2486, 2487, 2488, 2489, 2490, 2491, 2492, 2493, 2494, 2495, 2496, 2497, 2498, 2499, 2500, 2501, 2502, 2503, 2504, 2505, 2506, 2507, 2508, 2509, 2510, 2511, 2512, 2513, 2514, 2515, 2516, 2517, 2518, 2519, 2520, 2521, 2522, 2523, 2524, 2525, 2526, 2527, 2528, 2529, 2530, 2531, 2532, 2533, 2534, 2535, 2536, 2537, 2538, 2539, 2540, 2541, 2542, 2543, 2544, 2545, 2546, 2547, 2548, 2549, 2550, 2551, 2552, 2553, 2554, 2555, 2556, 2557, 2558, 2559, 2560, 2561, 2562, 2563, 2564, 2565, 2566, 2567, 2568, 2569, 2570, 2571, 2572, 2573, 2574, 2575, 2576, 2577, 2578, 2579, 2580, 2581, 2582, 2583, 2584, 2585, 2586, 2587, 2588, 2589, 2590, 2591, 2592, 2593, 2594, 2595, 2596, 2597, 2598, 2599, 2600, 2601, 2602, 2603, 2604, 2605, 2606, 2607, 2608, 2609, 2610, 2611, 2612, 2613, 2614, 2615, 2616, 2617, 2618, 2619, 2620, 2621, 2622, 2623, 2624, 2625, 2626, 2627, 2628, 2629, 2630, 2631, 2632, 2633, 2634, 2635, 2636, 2637, 2638, 2639, 2640, 2641, 2642, 2643, 2644, 2645, 2646, 2647, 2648, 2649, 2650, 2651, 2652, 2653, 2654, 2655, 2656, 2657, 2658, 2659, 2660, 2661, 2662, 2663, 2664, 2665, 2666, 2667, 2668, 2669, 2670, 2671, 2672, 2673, 2674, 2675, 2676, 2677, 2678, 26

07081 01-00 0003051-0001 0004744